

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
No. 1:14-cv-00954-LCB-JLW**

STUDENTS FOR FAIR)	
ADMISSIONS, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE UNIVERSITY OF NORTH)	
CAROLINA AT CHAPEL HILL, et al.,)	
)	
Defendants.)	

**MOTION BY ASIAN AMERICANS ADVANCING JUSTICE
AND ORGANIZATIONS AND PROFESSORS
SUPPORTING HOLISTIC ADMISSIONS POLICIES
SEEKING LEAVE TO FILE A BRIEF AS *AMICI CURIAE* IN RESPONSE TO
PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Local Rule 7.5, Asian Americans Advancing Justice and a number of organizations and professors who support holistic admissions policies¹ move the Court for leave to file a brief as *amici curiae* in response to Plaintiff’s Motion for Summary Judgment. *Amici* include non-profit, nonpartisan organizations that focus on civil and human rights and empowering Asian Americans and Pacific Islanders; civil rights organizations; advocacy organizations; bar associations; business associations; academic institutions; student organizations; and professors.

¹ See Exhibit A for a full listing of those joining this motion for leave and the associated brief.

In this case, the Plaintiff says that the University of North Carolina at Chapel Hill holds Asian Americans to a higher academic standard than underrepresented minorities, and asks the Court to eliminate consideration of race completely from the admissions process at UNC. *Amici* have a substantial interest in this case. Because they believe strongly in the educational benefits of racial and ethnic diversity, *Amici* support race-conscious programs that improve equal access for everyone.

In *Amici*'s view, UNC's nuanced admissions process does not hold Asian Americans to a higher academic standard than underrepresented minorities. Moreover, eliminating the consideration of race from the admissions process will not address the needs of underrepresented Asian American sub-groups.

Amici support the promise of integrated, equal public education that is set forth in *Brown v. Board of Education*, 347 U.S. 483 (1954), and they believe that eliminating the consideration of race would be devastating to all communities of color, including Asian Americans and Pacific Islanders. Asian Americans and Pacific Islanders have often joined other communities of color in the fight for equity and justice in the United States. *Amici* therefore respectfully request leave to file as *amici curiae* a brief in response to the Plaintiff's Motion for Summary Judgment. Defendants and Defendant-Intervenors consent to this motion.

Pursuant to Local Rule 7.5(b), *amici* have conditionally filed their brief with this motion and are submitting a proposed order along with the motion.

This the 4th day of March, 2019.

FOX ROTHSCHILD LLP

/s/ Matthew Nis Leerberg

Matthew Nis Leerberg
N.C. State Bar No. 35406
mleerberg@foxrothschild.com
P.O. Box 27525
Raleigh, NC 27611
Telephone: (919) 755-8700
Facsimile: (919) 755-8800

Kip D. Nelson
N.C. State Bar No. 43848
knelson@foxrothschild.com
Whit Pierce
N.C. State Bar No. 46327
wpierce@foxrothschild.com
300 N. Greene Street
Suite 1400
Greensboro, NC 27401
Telephone: (336) 378-5200
Facsimile: (336) 378-5400

Nicole Gon Ochi
Asian Americans Advancing Justice - LA
nochi@advancingjustice-la.org
1145 Wilshire Blvd.
Los Angeles, CA 90017
Telephone: (213) 977-7500

Phi Nguyen
Hillary Li
Asian Americans Advancing Justice - Atlanta
pnguyen@advancingjustice-atlanta.org
hli@advancingjustice-atlanta.org

5680 Oakbrook Parkway, Suite 148
Norcross, CA 30093
Telephone: (404) 585-8446

Winifred Kao
Asian Americans Advancing Justice
- Asian Law Caucus
winifredk@advancingjustice-alc.org
55 Columbus Avenue
San Francisco, CA 94111
Telephone: (415) 848-7736

*Counsel for Amicus Curiae Asian Americans
Advancing Justice and Organizations and
Professors Supporting Holistic Admissions
Policies*

Exhibit A: Full List of *Amici Curiae* Joining Asian Americans Advancing Justice

Organizations

1. 18MillionRising.org

18MillionRising.org (18MR.org) brings Asian American communities together online and offline to reimagine Asian American identity with nuance, specificity, and power. It is using this Asian American identity as the foundation to build a more just and creative world where Asian American experiences are affirmed, their leadership is valued, and all of them have the opportunity to thrive. Using technology and popular culture, 18MR.org develops new ways for Asian Americans and allies to collaborate, create new ways of being, and transform the world around them. 18MR.org utilizes digital-first advocacy tactics to elevate the voices of and mobilize its over 120,000 members to take action on issues that matter to them. 18MR.org creates meeting places online where young Asian Americans can deliberate together about what it means to be Asian American in the 21st century.

2. AAPIs for Civic Empowerment Education Fund

AAPIs for Civic Empowerment Education Fund is a network of grassroots AAPI organizations working to advance policies, campaigns, and issues that support low-income Asian American and Pacific Islanders (AAPIs). AAPIs for Civil Empowerment EF believes that increased civic participation amongst AAPIs is critical to ensure political representation and achieve genuine democracy. AAPIs for Civil Empowerment EF believes that race-conscious policies are critical to underserved and underrepresented AAPI communities.

3. After Bruce

After Bruce is a PR and marketing firm committed to the advancement of AAPI and other underrepresented communities in the media landscape. After Bruce believes in the power of independent filmmakers, community-minded organizations, and socially conscious businesses to elevate voices, influence audiences, and impact the most pressing issues AAPIs face.

4. American Citizens for Justice

American Citizens for Justice is a 501(c)(3) civil rights advocacy organization dedicated to protecting the civil rights interests for Asian Americans among all Americans.

5. American Muslim Voice Foundation

The mission of American Muslim Voice Foundation is to foster friendships among all Americans by bridging cultural and religious gaps. The organization works towards protecting and preserving civil liberties and constitutional rights for all.

6. Asian Pacific Islander Americans for Civic Empowerment (APACE)

Asian Pacific Islander Americans for Civic Empowerment (APACE) in Washington strives to increase access and participation in electoral and civic affairs by registering, educating, and protecting APIA voters. APACE stands in unequivocal support of affirmative action in Washington state and across the nation.

7. API Equality – Northern California

API Equality - Northern California works to build LGBTQ API power through training and developing new leaders, establishing intergenerational connections, and documenting and disseminating our histories. APIENC is committed to racial justice and solidarity with all people of color.

8. Arab American Action Network

The Arab American Action Network (AAAN) strives to strengthen the Arab community in the Chicago area by building its capacity to be an active agent for positive social change. As a grassroots nonprofit, AAAN's strategies include community organizing, advocacy, education, providing social services, leadership development, cultural outreach, and forging productive relationships with other communities. AAAN's vision is for a strong Arab American community whose members have the power to make decisions about actions and policies that affect their lives, and access to a range of social, political, cultural, and economic opportunities in a context of equity and social justice.

9. Arizona Asian & Pacific Islander American VoteTable

Arizona Asian & Pacific Islander American VoteTable works to advance justice, fairness, and equal opportunity for all Americans through voting advocacy.

10. Asian & Latino Solidarity Alliance of Central Virginia

The Asian & Latino Solidarity Alliance of Central Virginia is a non-profit, non-partisan organization based in Central Virginia whose mission is to advance common objectives impacting the Asian and Latino communities. The alliance strives for equitable representation, visibility, and access to economic and social programs that enrich their lives. The alliance acts as the connective tissue between the various community groups within the Central Virginia multicultural community. The alliance engages in partnerships

with community, faith-based, local government, and business groups to amplify their voices; connect and support their work; and empower and engage current and future leaders.

11. Asian American Legal Defense and Education Fund

The Asian American Legal Defense and Education Fund (“AALDEF”), headquartered in New York City and founded in 1974, is a national organization that protects and promotes the civil rights of Asian Americans. By combining litigation, advocacy, education, and organizing, AALDEF protects the rights of Asian Americans and supports educational equity in higher education. AALDEF has an interest in this litigation because its work with community-based youth advocates across the country has revealed that Asian American students benefit from individualized race-conscious admissions policies as well as from diverse educational settings. AALDEF opposes any cap, quota, or negative action against Asian Americans. However, AALDEF believes that narrowly tailored, individualized admissions programs strongly benefit the Asian American community. AALDEF has filed amicus curiae briefs in several higher education affirmative action cases including *Fisher I* & *Fisher II*.

12. Asian American Political Alliance (AAPA), University of California, Berkeley

AAPA stands in solidarity with all oppressed peoples nationally and internationally fighting for self-determination in their communities and respective countries. AAPA rejects racist attempts to divide Asian Americans and Third World peoples from their common struggle for real equality.

13. Asian Community Development Council (ACDC)

The mission of the Asian Community Development Council (ACDC) is to improve the general well-being and education of the Asian, Pacific Islander and other ethnic communities in Nevada. ACDC’s goal is to educate, connect, and empower our youth.

14. Asian Counseling and Referral Service

ACRS promotes social justice and the well-being and empowerment of Asian Americans and Pacific Islanders and other underserved communities—including immigrants, refugees, and American-born—by developing, providing, and advocating for innovative, effective, and efficient community-based multilingual and multicultural services.

15. Asian Law Alliance

The Asian Law Alliance, founded in 1977, is a non-profit public interest legal organization with the mission of providing equal access to the justice system to the Asian and Pacific Islander communities in Santa Clara County, California.

16. Asian Pacific American Bar Association of Los Angeles County

The Asian Pacific American Bar Association of Los Angeles County, formed in 1998, advocates on issues that impact the AAPI community and is committed to civil rights, racial justice, and equal opportunity. APABA-LA opposes initiatives designed to deprive immigrants, people of color, and other minorities of their civil rights, and advocates for equal treatment and opportunity in education for AAPIs and all people of color.

17. Asian Pacific American Labor Alliance (APALA), AFL-CIO

Founded in 1992, the Asian Pacific American Labor Alliance (APALA), AFL-CIO, is the first and only national organization of Asian American and Pacific Islander (AAPI) workers and allies. APALA works to advance worker, immigrant and civil rights. APALA is committed to defending race-conscious admission because 76% of Asian Americans support policies that increase educational opportunities for women and minorities. These policies are crucial for AAPI workers to gain access to educational opportunities for their youth.

18. Asian Pacific Policy and Planning Council

As a coalition of forty community-based organizations serving the 1.5 million Asian Pacific Islanders in the greater Los Angeles area, Asian Pacific Policy and Planning Council (A3PCON) strongly supports race conscious holistic admissions policies that seek to provide equitable access to higher education for millions of students of color. Since 1976, A3PCON and our member organizations have worked to combat systemic racism against all communities of color. A3PCON joins this brief to reflect its long-standing commitment to social justice.

19. Asian/Pacific Islander Law Students Association at University of California, Los Angeles School of Law

APILSA serves as a valuable resource for law students to succeed academically, socially, politically, and professionally. APILSA coordinates numerous events and activities that educate and inform members about current Asian Pacific Islander issues, and prepare members to manage such issues in both academic and professional legal settings. APILSA also provides a common forum for expressing members' needs and concerns as Asian Pacific Islander law students. APILSA strives to develop innovative programs that

lend academic and peer support, and aspire to continue the organization's long-standing success.

20. Association for Asian American Yale Alumni (AAAYA)

The Association of Asian American Yale Alumni is a volunteer-run, membership based, 501(c)3 nonprofit organization that provides a vehicle for Yale University alumni to promote the civic participation, leadership and service of Asian Americans and Asians at Yale and in the broader society.

21. Baltimore Asian Resistance in Solidarity

Baltimore Asian Resistance in Solidarity (BARS) brings together Asians and Pacific Islanders of all backgrounds in Baltimore for learning, mutual support, and radical organizing. BARS is organized against all oppressive systems, including racism and anti-blackness, in solidarity with all peoples of color. As BARS amplifies the voices of API people, it does so in harmony with all marginalized peoples because their liberation is tied together.

22. Berkeley Law Asian Pacific American Law Students Association (APALSA)

The Asian Pacific American Law Students Association (APALSA) is dedicated to the empowerment of Asian American and Pacific Islander law students and strives to meet the political, cultural, social, academic, and career needs of Berkeley law students interested in Asian Pacific Islander issues. In addition, the group's mission includes recruitment of under-represented students, particularly Southeast Asian and Filipino students.

23. Chinese American Citizens Alliance (C.A.C.A.), Los Angeles Chapter

One of the main purposes and objectives of C.A.C.A., the nation's oldest, continuous civil rights and advocacy organization for citizens of Chinese ancestry is to assure the education of our youth and community. C.A.C.A. understands the distinction between race-bias and race-conscious admission practices.

24. Chinese American Progressive Action

CAPA shares with Chinese Americans and the broader U.S. public how progressive, forward-looking policies benefit our communities. CAPA believes in justice, fairness, and an inclusive economy that provides opportunity for all Americans. CAPA lifts up Chinese American voices on the important issues that affect our country's future and encourages Chinese Americans to take political action, lead its communities, and build coalitions to ensure a strong and diverse America. As such, CAPA opposes this lawsuit which threatens racial integration at UNC.

25. Chinese for Affirmative Action (CAA)

Chinese for Affirmative Action (CAA) is a 50-year old community-based organization dedicated to defending the civil rights of Chinese Americans and advancing multiracial democracy in the United States. CAA engages in direct services, leadership development, civic engagement, policy advocacy, strategic communications, and movement building on a range of social justice issues. These issues include immigrant rights, education equity, affirmative action, language diversity, economic opportunity, and community safety and justice.

26. Chinese Progressive Association

The Chinese Progressive Association (San Francisco, CA) was founded in 1972 and educates, organizes and empowers the low income and working class immigrant Chinese community in San Francisco to build collective power with other oppressed communities to demand better living and working conditions and justice for all people. Racial justice is a key value and part of its work for the past 46 years, and Chinese Progressive Association understands how critical racial justice, equity, and diversity are if its communities are to be healthy and thrive.

27. Claremont South Asian Student Association

Claremont South Asian Student Association (SASA) is an organization for South Asian identifying students at the Claremont Colleges. SASA strives to be a space that is inclusive of all of its members, especially those from historically marginalized South Asian identities. As an organization, it wants to pursue advocacy around issues that directly affect South Asian communities both in the United States and in South Asia. In building a community that is inclusive of all South Asians, it strongly support race-conscious admissions.

28. Coalition for a Diverse Harvard

Coalition for a Diverse Harvard ("Diverse Harvard") is a group of over 1,100 Harvard students and alumni of diverse racial and ethnic backgrounds, including approximately 250 Asian American members. Diverse Harvard was launched in 2016 by Harvard and Radcliffe alumni to take a stand against an anti-affirmative action slate of candidates for Harvard's Board of Overseers, the University's second-highest governing body. Diverse Harvard's mission is to fight for diversity, equity, and inclusion at our own University and in higher education at large. Diverse Harvard believes that assembling a diverse student body and creating an environment where all students can thrive is central to the mission of higher education: developing successful citizens and leaders in a diverse nation and world.

29. Coalition for Asian American Children and Families (CACF)

CACF advocates for equity and opportunity for marginalized Asian Pacific American (APA) children and families. CACF is building a community too powerful to ignore by: Using and sharing information that counters the model minority myth and sheds light on community needs, activating APA youth and community members as “social justice” leaders, and mobilizing a coalition of partners to fight for systems and policy change. CACF’s vision is for all children and families, including Asian Pacific Americans, in New York City to be safe, healthy, and able to reach their full potential in life.

30. Council on American-Islamic Relations, California

The Council on American-Islamic Relations, California (CAIR-CA) is one of the largest American Muslim civil rights and advocacy organizations. CAIR-CA’s mission is to enhance the understanding of Islam, encourage dialogue, protect civil liberties, and empower American Muslims. Through its four offices, CAIR-CA serves California’s estimated one million American Muslims by providing direct legal services to victims of discrimination, working with the media, facilitating community education, and engaging in policy advocacy to advance civil rights and civic engagement. CAIR-CA serves individuals from mostly Arab, Middle Eastern, Muslim and South Asian (AMEMSA) communities.

31. Duke Asian American Studies Program

Duke University's Asian American Studies Program (AASP) offers interdisciplinary perspectives on the historical and current-day status of Asian Americans and Pacific Islanders in its society. AASP is committed to supporting the University of North Carolina’s race-conscious holistic admissions policies.

32. Duke Asian Students Association

Duke Asian Students Association (DASA) stands in support of the affirmative action policies at UNC Chapel Hill. DASA refuses to see Asian/American students be exploited and complicit as a wedge against important equity practices, under the guise of "fair admissions," especially at a university with whom the organization’s members share many strong ties. DASA refuses to see the hard work of progressive activists, which indeed includes Asian activists and supporters at an earlier point in history, be dismantled in the fight against affirmative action today.

33. East Coast Asian American Student Union

The East Coast Asian American Student Union (ECAASU) is a non-profit organization that serves to inspire, educate, and empower those interested in Asian

American and Pacific Islander issues. ECAASU was originally founded after the Bakke decision in 1978, in recognition of the need to build an advocacy network that fosters mutual support and solidarity. ECAASU fights for justice and equal opportunities for all marginalized communities. Its members are veterans of the Third World Liberation Front student strike at UC Berkeley in 1969. For the past 50 years ECAASU has been standing up and fighting for justice and equity for students of color. The organization is proud to join this amicus brief and AAAJ and others in this important fight.

34. Empowering Pacific Islander Communities

Empowering Pacific Islander Communities (EPIC), a non-profit organization based in Los Angeles, strives for the empowerment of Pacific Islander communities. The persistence of institutional discrimination in higher education presents a significant barrier to Native Hawaiians and Pacific Islanders. EPIC's mission is to mobilize Pacific Islander communities to foster opportunities for achieving social justice through advocacy, research, and development.

35. GAPIMNY—Empowering Queer & Trans Asian Pacific Islanders

GAPIMNY—Empowering Queer & Trans Asian Pacific Islanders (GAPIMNY) is an all-volunteer, membership-based community organization that empowers queer and transgender Asian Pacific Islander people in the greater New York metropolitan area. GAPIMNY is committed to advancing racial justice and LGBTQ rights for intersectionally marginalized communities, and supports affirmative action as a policy that equalizes opportunity.

36. Harvard Asian American Women's Association

The Asian American Women's Association (AAWA) was created in 2005 as an inclusive, welcoming space for those on campus who identify with the experiences of Asian American women, including those who identify as gender non-conforming. AAWA's mission is to be a space where students can learn from and consequently empower each other. AAWA's founding members felt that Harvard students needed a community that was non-competitive and open to understanding each other's experience; as such, membership to AAWA is open to anyone without membership fees or requirements. AAWA has been cultivated so that students do not feel as though they must conform to or abide by any expectations to be included. Because AAWA values every lived experience as inherently valid and valuable, it has been committed to diversity and supporting fellow students from the very beginning of its existence. AAWA has and always will endeavor to foster a sense of belonging for people of very different backgrounds. AAWA also realizes that communities of color are stronger when they are united. AAWA therefore refuses to be used as a racial wedge and political tool by those who do not have its community's interests at heart. AAWA believes that the proposed end of race-inclusive

admissions policies is tantamount to the erasure of the racial inequality in education systems and society at large. Although AAWA serves primarily Harvard students, it also realizes that the fight for educational justice and greater educational accessibility cannot be confined to our campus. Therefore, it stands in solidarity with communities of color and students throughout the country.

37. Harvard Vietnamese Association

Harvard Vietnamese Association (HVA) is a cultural organization that aims to foster a sense of community for Vietnamese-identifying students on campus. HVA is committed to diversity and inclusion at Harvard and recently signed on to be part of an amicus brief for the *SFFA v. Harvard* lawsuit. As a group representing students who are often erased in conversations around Asian American issues, HVA hopes to bring the experiences of Vietnamese students to the table.

38. Jakara Movement

The Jakara Movement is the largest Sikh youth organizing community benefit organization in the nation and our membership includes a large Asian American population. It believes race-conscious holistic admissions policies play an important role in building an American civic life that is open and representative of its diverse communities and populations.

39. Japanese American Citizens League

The Japanese American Citizens League is the nation's largest and oldest Asian American civil rights organization whose mission is to secure and safeguard the civil and human rights of Asian and Pacific Islander Americans and all communities who are affected by injustice and bigotry. The leaders and members of the JACL also work to promote and preserve the heritage and legacy of the Japanese American community.

40. Lambda Phi Epsilon at North Carolina State University

Lambda Phi Epsilon at North Carolina State University is an Asian-Interest fraternity that strives to help each brother achieve their fullest potential. We believe that personal development cannot be complete without social justice and civil rights. Asian Americans bring new perspectives to the Greek system through involvement in our communities, and we encourage our brothers to be catalysts for change. We believe that race-conscious admissions benefits our brothers and support UNC's admissions policies.

41. MinKwon Center for Community Action

The mission of MinKwon Center for Community Action is to empower the Korean American community and work with the broader Asian American and immigrant

communities to achieve social and economic justice for all. The center believes that being blind to race, especially in the context of admissions and access, is to be blind to the unique and structural problems that continue to exist for different racial groups.

42. Muslim Student Association West (MSA West)

Muslim Student Association West (MSA West) is a grassroots organization comprised of Muslim Student Associations (MSAs) representing campuses across the West Coast of the United States. MSA West is a cohesive coalition of Muslim students united for the sake of Allah (God) who aim to embody the concepts of unity, strength, and activism.

43. National Asian Pacific American Families Against Substance Abuse (NAPAFASA)

NAPAFASA is the nation's sole advocacy organization focused on the behavioral health needs of Asian Americans, Native Hawaiians, and Pacific Islanders. NAPAFASA supports the continuing usage of race-conscious admissions policies for higher education. In its work with local communities, students of Southeast Asian and Pacific Islander descent are at significantly higher risk for substance use disorders and related addictions (as well as those of African and Latino descent). Universities and colleges can make better decisions in their holistic admissions procedures with this limited additional information. NAPAFASA therefore joins as an amicus in support of UNC's race-conscious admissions policy.

44. National Asian Pacific American Women's Forum

The National Asian Pacific American Women's Forum (NAPAWF) is the only national, multi-issue Asian American and Pacific Islander (AAPI) women's organization in the country. NAPAWF's mission is to build the collective power of all AAPI women and girls to gain full agency over their lives, families, and communities. NAPAWF's work is centered in a reproductive justice framework that acknowledges the diversity within their community and ensures that different aspects of their identity—such as ethnicity, immigration status, education, sexual orientation, gender identity, and access to healthcare—are considered in tandem when addressing their social, economic, and health needs.

45. National Council of Asian Pacific Americans (NCAPA)

National Council of Asian Pacific Americans (NCAPA) is a national coalition of 33 Asian American and Pacific Islander (AAPI) organizations striving for equity and justice by organizing their diverse strengths to influence policy and shape public narratives. Their coalition members work together on policy issues that are deeply tied to their communities,

ranging from civil rights, education, health, housing & economic justice and immigration. They recognize that race-conscious holistic admissions policy is essential to creating a more racially diverse and equitable learning environment. The coalition believes that this attempt to dismantle such policy is an attempt to drive a wedge between AAPIs and other minority and underserved communities. In fact, the coalition believes that the community has directly benefited from efforts to increase racial diversity in higher education. The coalition further believes that educational attainment and socioeconomic data on Southeast Asian, Native Hawaiian and Pacific Islander communities clearly illustrate the need for the continuation of race-conscious holistic admissions policies for many within their communities.

46. National Queer Asian Pacific Islander Alliance (NQAPIA)

The National Queer Asian Pacific Islander Alliance is a federation of lesbian, gay, bisexual, and transgender (LGBT) Asian American, South Asian, Southeast Asian, and Pacific Islander (API) organizations. NQAPIA builds the capacity of local LGBT API groups, develops leadership, promotes visibility, educates the community, invigorates grassroots organizing, encourages collaborations, and challenges anti-LGBT bias and racism.

47. National Tongan American Society (NTAS)

The National Tongan American Society was created in 1994 providing assistance with immigration and translation services. It is the oldest nonprofit organization of its kind in Utah. Today, NTAS works in various sectors, including immigration, healthcare and public benefits, education, wellness, and voter engagement, to support and advocate for civil rights, equity, and social justice.

48. New Mexico Asian Family Center

New Mexico Asian Family Center is the only nonprofit, nonpartisan organization that provides culturally-specific and linguistically-appropriate services to the Pan-Asian population in the state of New Mexico. Its programs and services include survivor-centered, trauma-informed case management, counseling, and legal support for survivors of gender-based violence, as well as multigenerational family programming, cross-racial collaboration building, and early childhood education initiatives. It is heavily invested in nonpartisan civic engagement and policy change in order to work towards a more culturally accessible and equitable New Mexico.

49. North Carolina Asian Americans Together

North Carolina Asian Americans Together (NCAAT) is a nonpartisan, nonprofit organization committed to supporting equity and justice for all by fostering community

among Asian American Pacific Islanders (AAPIs) and allies in North Carolina through civic engagement, leadership development, grassroots mobilization, and political participation. NCAAT's work is guided by principles and strategies including increasing visibility of the rapidly growing AAPI population in North Carolina by adding voices to the public discourse, working within an intersectional framework for racial justice and civil rights, and creating structural change, as well as greater justice within current systems.

50. North Carolina State University Asian Students in Alliance

The Asian Students in Alliance (ASIA) is a council overseeing 14 Asian-interest organizations at North Carolina State University. ASIA consistently collaborates with Asian American student groups at University of North Carolina - Chapel Hill to bring more visibility to Asian American identities. Therefore, ASIA firmly believes that it should support UNC in this case with the resources available at its campus.

51. OCA - Asian Pacific American Advocates

OCA - Asian Pacific American Advocates is dedicated to advancing the social, political, and economic well-being of Asian Americans and Pacific Islanders. OCA supports holistic admissions practices (inclusive of race, ethnicity, and sex) and seeks to prevent the dismantling of Affirmative Action in higher education admissions.

52. OCA Greater Phoenix

As an Asian Pacific American civil rights organization, OCA Greater Phoenix has always advocated for, and will continue to advocate for, equity in the education system. OCA Greater Phoenix believes that affirmative action policies in higher education are the cornerstone of socioeconomic justice and progress for the underrepresented communities that the organization's members are a part of and strive to serve.

53. Pacific Islander Health Partnership

Pacific Islander Health Partnership's (PIHP's) mission is to improve the health of Native Hawaiians and Pacific Islanders (NHPIs) by engaging communities, researchers, and policymakers. The organization educates Pacific Island communities about chronic illnesses, promotes research that sheds light on Pacific Islander health disparities, and advocates for policies that ensure NHPI communities receive resources that address the root causes of health disparities. PIHP is participating in this amicus brief because race-conscious admissions policies are necessary to address the historical underrepresentation of NHPIs in higher education institutions and in healthcare professions. PIHP believes that education achievement level has a profound impact on community health by improving the ability to navigate health care systems, increasing access to resources, and enhancing the health characteristics of community environments.

54. Pilipino American Law Society at Berkeley Law

Pilipino American Law Society (PALS) is a student-led group that strives to address the needs of law students of Filipino decent through mentorship, career advising, and social activities. Born of the common experiences and challenges of students from Filipino-American backgrounds, PALS is a community that fosters inclusiveness, well-being, and academic achievement throughout students' time at Berkeley Law.

55. Pilipino Workers Center of Southern California

Pilipino Workers Center (PWC) was formed in 1997 to promote safe working conditions, living wages, decent living conditions, access to quality healthcare, and basic human dignity. PWC advocates in the areas of employment, immigration, healthcare, housing, and youth empowerment. PWC believes in creating a level playing field for marginalized communities.

56. Reappropriate

Reappropriate is the web's longest-running and one of its most widely-read AAPI race and feminism blogs.

57. South Asian Americans Leading Together (SAALT)

SAALT is a national, nonpartisan, non-profit organization that fights for racial justice and advocates for the civil rights of all South Asians in the United States. The organization's ultimate vision is dignity and inclusion for all.

58. South Asian Law Students Association at the University of Michigan Law School

SALSA seeks to foster a cohesive South Asian community at Michigan Law School whose members will go on to become active members in the South Asian community at large. SALSA aims to encourage the South Asian community at the Law School, as well as the larger law student body and other organizations around campus, to engage in legal and social issues important to South Asia and the South Asian diaspora.

59. Southeast Asia Resource Action Center (SEARAC)

SEARAC is a national civil rights organization that seeks to empower Cambodian, Laotian, and Vietnamese American communities to create a socially just and equitable society. As representatives of the largest refugee community ever resettled in the United States, SEARAC stands together with other refugee communities, communities of color, and social justice movements in pursuit of social equity. SEARAC's National Equity

Agenda includes education policy priorities focused on college access, affordability, and completion, such as support for race-conscious college admissions policies that look beyond test scores to assess a student's capacity to thrive in college. SEARAC was also a signer of the Asian American Legal Defense and Education Fund's amici brief in support of Harvard's race-conscious admissions policies in 2018.

60. Task Force on Asian and Pacific American Studies at Harvard College (TAPAS)

TAPAS was founded in 2016 as a student organization dedicated to establishing a robust ethnic studies curriculum at Harvard. To date, TAPAS' central mission remains the same, although the organization has also begun to address other issues relating to Asian American advocacy. Over the past couple of years, TAPAS has coordinated meetings with key administrators at Harvard, organized a rally for ethnic studies, and planned events related to ethnic studies for students on campus. In 2017, TAPAS released a petition to the Harvard administration that garnered thousands of signatures from students, student groups, and faculty members.

61. Third World Liberation Front (TWLF), University of California, Berkeley

TWLF is in solidarity with all oppressed peoples nationally and internationally fighting for self-determination in their communities and respective countries. TWLF rejects racist attempts to divide Asian Americans and Third World peoples from their common struggle for real equality.

62. Third World Liberation Front '69 Ad Hoc Committee

TWLF '69 Ad Hoc Committee is composed of veterans of the Third World Liberation Front (TWLF) student strike at UC Berkeley in 1969. For the past 50 years, the Committee has been standing up and fighting for justice and equity for students of color. The Committee is proud to join this amicus brief and AAAJ and others in this important fight.

63. U.S. Palestinian Community Network (USPCN)

The U.S. Palestinian Community Network (USPCN) is a Palestinian community-based organization, founded in 2006 to revitalize grass-roots organizing in the Palestinian community in the U.S. The organization's members and leaders believe that affirmative action in college and university admissions policies must be upheld. Institutional and structural racism have devastated communities of color in this country for centuries, and it is only through equitable policies in government and the private sector that all people in America—not just the privileged—can live productive and fruitful lives.

64. University of California, Los Angeles South Asian Law Students Association

UCLA SALSA is dedicated to providing a forum for South Asian law students to exchange thoughts and ideas, develop a community support and referral network, and address the needs of the larger South Asian community—particularly its most marginalized members.

65. University of North Carolina alpha Kappa Delta Phi

The Associate chapter of the alpha Kappa Delta Phi International Sorority at UNC fosters the making of successful leaders by assisting and challenging its members to reach their maximum potential. The organization strives to maintain the highest levels of integrity and innovation in the promotion of sisterhood, philanthropy, scholastic excellence, and Asian-Awareness in the community while creating lifelong relationships. As an Asian-interest sorority, the chapter would like to stand in support of and solidarity with UNC and the AAPI organizations spearheading this case in defending UNC's holistic race-conscious application process.

66. University of North Carolina Asian American Law Students Association

Asian American Law Students Association (AALSA) is a diversity student organization at UNC School of Law. The mission of AALSA is to promote diversity and to serve Asian Pacific American students' interests at the school of law. By holding diversity events and offering legal services to the Asian Pacific American community, AALSA has been dedicated to ensuring that minority students' voices are heard and promoting a more inclusive studying environment at the school of law.

67. University of North Carolina - Chapel Hill Asian American Students Association

UNC-CH Asian American Students Association is dedicated to advancing the needs and interests of UNC's Asian/Asian American population. The association stands in solidarity with other student groups of color in supporting race-conscious admissions practices at UNC-CH and everywhere.

68. University of North Carolina - Chapel Hill Campus Y Executive Board

The Campus Y, UNC's Hub for Social Justice and Social Innovation, is the university's oldest and largest student-run organization. Founded in 1860, the Campus Y's mission centers on engaging students, the UNC campus, and communities in the pursuit of social justice. The organization's work ranges from criminal justice advocacy to environmental organizing to youth programming and more.

69. Union of North American Vietnamese Student Associations

Union of North American Vietnamese Student Associations is a non-profit, community based organization dedicated to cultivating the next generation of leaders who will serve as advocates for the Vietnamese community. UNAVSA educates and mobilizes student and young Vietnamese North Americans on economic, political, and social issues affecting the Vietnamese diaspora.

70. University of Michigan, Asian Pacific American Law Students Association

The Asian Pacific American Law Students Association (APALSA) is an organization of law students dedicated to advocating for the Asian Pacific American community at Michigan Law, providing academic and professional resources for its members and creating a social and professional network to connect students and alumni. APALSA sees the recent lawsuits by those opposed to holistic race-conscious admissions and the use of Asian Pacific Americans as a wedge in that agenda as an affront to the Asian Pacific American community and APALSA's commitment to seeking racial justice. The organization has worked to educate its members and their communities to dispel the misinformation spread by the lawsuits and is unwavering in its support of efforts in opposition to these divisive acts.

71. University of Pennsylvania Asian Pacific Student Coalition

The purpose of APSC is to voice and support the common interests and concerns of the Asian Pacific Islander community, to provide a forum for discussion, action, and exploration of issues of concern to students, and to present and to celebrate the richness of the diverse Asian Pacific cultures and backgrounds to the University community and beyond. Within the Asian Pacific Islander community, APSC works to strengthen the relationships among its 22 constituent groups by planning cultural and social events that build a sense of unity around the idea of the Pan-Asian experience. Outside of the Asian Pacific Islander community, APSC serves as the voice of 20% of the undergraduate student body by acting as the representative of the Asian Pacific Islander community in meetings with faculty, administration, student groups, and media. APSC supports this amicus brief because the organization strives to uplift the voices and lived experiences of all minority students and will not condone the utilization of Asian Americans as a wedge between other communities of color in this, or any other, instance.

72. Vietnamese American Bar Association of Southern California

The Vietnamese American Bar Association of Southern California is an association of attorneys, judges, law professors, and law students, providing a network for its members and affiliates with practice settings ranging from solo practices to large firms, corporations,

legal services organizations, non-profit organizations, law schools, and governmental agencies.

Professors

73. C. Casey Ozaki, University of North Dakota
74. C.N. Le, University of Massachusetts, Amherst
75. Cheryl D. Ching, University of Massachusetts, Boston
76. Corinne Kodama, University of Illinois at Chicago
77. David Hòa Khoa Nguyễn, Indiana University – Purdue University Indianapolis
78. Dian Squire, Northern Arizona University
79. Christin DePouw, University of Wisconsin – Green Bay
80. Jennifer Ho, University of North Carolina – Chapel Hill
81. Stephanie Kim, Georgetown University
82. Janelle Wong, University of Maryland
83. Julie J. Park, University of Maryland
84. Kevin Kumashiro, consultant and former Dean of the School of Education at the University of San Francisco
85. Liliana M. Garces, University of Texas at Austin
86. Liza A. Talusan, consultant and former professor at University of Massachusetts Boston
87. Marc Johnston-Guerrero, Ohio State University
88. Min Zhou, University of California, Los Angeles
89. Nancy Leong, University of Denver, Sturm College of Law
90. Oiyan Poon, Colorado State University
91. Sunaina Maira, University of California, Davis
92. Matthew Witenstein, University of Dayton

93. Varaxy Yi Borromeo, California State University, Fresno

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document has been filed electronically with the Clerk of Court using the CM/ECF system, which will send notification to counsel

This the 4th day of March, 2019.

/s/ Matthew Nis Leerberg
Matthew Nis Leerberg